

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <hr/> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>RAS Citron, LLC Authorized Agent for Secured Creditor 130 Clinton Road, Lobby B, Suite 202 Fairfield, NJ 07004 Telephone: 973-575-0707 Facsimile: 973-404-8886</p> <p>Harold N. Kaplan HK0226</p>
<p>In Re:</p> <p>Michael T. Heuser, Sr. and Rhonda C. Heuser</p> <p>Debtors.</p>

Case No.: 18-28534-ABA

Chapter: 7

Hearing Date: November 13, 2018

Judge: Andrew B. Altenburg Jr.

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
November 13, 2018 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<p><i>Debtors-</i> Michael T. Heuser, Sr. 1059 Ocean Heights Ave. # 1030 Egg Harbor Township, NJ 08234</p> <p>Rhonda C. Heuser 1059 Ocean Heights Ave. # 1030 Egg Harbor Township, NJ 08234</p>	<p><i>Debtor's Attorney-</i> Bruno Bellucci, III BellucciLaw, PC 1201 New Road Suite 138 Linwood, NJ 08221</p>	<p><i>Trustee-</i> Thomas J Subranni Subranni Zauber 1624 Pacific Avenue Atlantic City, NJ 08401</p>	<p><i>U.S. Trustee-</i> U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102</p>
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PLEASE TAKE NOTICE that on November 13, 2018 at 10:00 A.M., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for Madison Revolving Trust 2017, the within creditor ("Creditor"), shall move before the Honorable Andrew B. Altenburg Jr., United States Bankruptcy Judge, at Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4B, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, District of New Jersey, PO Box 2067, Camden, NJ 08101**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202, Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: 10/18/2018

RAS Citron, LLC
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By: /s/ Harold N. Kaplan
Harold N. Kaplan, Esquire
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